

Exhibit M

Certified Copy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF HUMBOLDT**

CARLA ALLEN,)
Plaintiff,)
vs.) CASE NO. DR180132
BRENNETAG NORTH AMERICA,)
INC.; (sued individually)
and as successor-in-interest)
to MINERAL PIGMENT)
SOLUTIONS, INC., and as)
successor-in-interest to)
WHITTAKER, CLARK &)
DANIELS, INC.), et al.,)
Defendants.)

DEPOSITION OF

WILLIAM E. LONGO, PhD

September 14, 2018

11:30 a.m.

11695 Medlock Bridge Road
Johns Creek, Georgia

Debra R. Luther, RMR, CRR, CCR-B-881



1 are different particles because they have different
2 optical properties; correct?

3 A. Correct.

4 Q. That's because they belong to different
5 crystal classes; right?

6 A. Orthorhombic versus monoclinic, and that's
7 typically what you're dealing with there.

8 Q. Do you still hold the view that
9 anthophyllite twins?

10 A. I do.

11 Q. Have you looked it up since we last spoke?

12 A. I think I -- when we last spoke I said it
13 did twin, didn't I?

14 Q. Yeah, you did.

15 A. Yeah, it twins.

16 Q. Okay. Is that what Deer, Howie, and
17 Zussman says?

18 A. I believe they do.

19 Q. Did you look it up in Deer, Howie, and
20 Zussman?

21 A. Not in a while.

22 Q. Okay. So in other words, you would find
23 out, for example -- strike that question.

24 If you got a particle that is exhibiting
25 parallel extinction, would that point you in one

1 direction or another?

2 A. I don't recall. I haven't done PLM in
3 such a long time.

4 Q. Who are you relying upon in your
5 laboratory to do the PLM analysis?

6 A. We have a couple people that do it.

7 Q. Who are they?

8 A. Paul Hess is one, Bill Egeland is one.
9 Those are the two -- those are the two primary people
10 who do it.

11 Q. Would Mr. Hess know what particles would
12 show a parallel extinction?

13 A. He may know all of them. If we just go
14 to, you know, the parallel extinction for tremolite
15 oblique, I think they call it, and then if you go to
16 ones with the anthophyllite, it will tell you what
17 the parallel extinction is for that.

18 Q. Does tremolite ever show parallel
19 extinction?

20 A. I don't think so. And again, it's been a
21 while since I've done this. The next time we talk I
22 can explain it all for you in more detail.

23 Q. Would there be a difference between
24 asbestosiform and nonasbestosiform tremolite as it
25 pertains to extinction angles?

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